

## **EXHIBIT 29**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

K.C., *et al.*, )  
Plaintiffs, )  
v. ) No. 1:23-cv-00595-JPH-KMB  
THE INDIVIDUAL MEMBERS )  
OF THE MEDICAL LICENSING )  
BOARD OF INDIANA, in their )  
official capacities, *et al.*, )  
Defendants. )

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**DECLARATION OF CHLOE COLE**

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I, Chloe Cole, pursuant to the provisions of 28 U.S.C. § 1746, do hereby declare as follows:

1. I am a detransitioned 18-year-old woman from California who went through the process of medical transition between the ages of 12–16.
2. The three main interventions I was given were puberty blockers and testosterone, starting at 13, and a double mastectomy at 15. I was treated negligently by my healthcare provider but the biggest failure they made was encouraging and allowing me to medically transition as a child in the first place.
3. My therapists and gender specialists failed to address several underlying circumstances and comorbidities that led to the onset of my gender dysphoria.
4. I began puberty when I was no older than 8 or 9. I had a lot of discomfort around my developing body. I was afraid to grow from a girl into a woman and experience things like

periods, childbirth, and menopause, because I would often only hear about how scary and painful being a woman was from other girls and older women.

5. I never really had any strong female role models and I often never felt that I fit in with other girls. I had a tomboyish streak due to the influence of my older brothers.

6. I was previously diagnosed with ADHD and not until age 17, I was diagnosed with autism. The gender specialist who referred me to surgery was also the same person who later recommended that I get screened for autism. The gender specialist only spent enough time with me after I already went down the transition path to see my obvious autism symptoms.

7. Because I am autistic, I have some more masculine behaviors and I am more competitive than most girls. I have some social, cognitive, and sensory processing differences that made school and going through puberty a little more difficult. All things considered these struggles were all normal but were misrepresented as problems having to do with my gender.

8. I have suffered a multitude of complications from the blockers, cross sex hormones, and surgery. My quality of life is still being negatively impacted to this day.

9. I had my puberty blocked when I was already about 4 years into puberty, so I started experiencing some menopause-like symptoms, including severe hot flashes and itching all over my body. These symptoms went away after I stopped taking puberty blockers, but I still have joint pain and shooting pains in my spine.

10. During a consultation for testosterone, I was told by my endocrinologist that I would experience vaginal atrophy. I was not informed that this atrophy actually affects the rest of the organs in the pelvic region. It caused me to experience episodes of severe uterine cramps that were rare, but unpredictable and worse than any menstrual cramps I've ever had.

11. I was prescribed topical estrogen, but my urinary tract was still affected, and I am still susceptible to dehydration and infection.

12. The status of my fertility is unknown, but I do not have the choice of breastfeeding my future children because my breasts are gone. I was told this by my surgeon but I did not understand the importance of breastfeeding or even being a parent because I was still a child.

13. I am now grieving my breasts and my girlhood that was cut short as an adult, and on top of that, the areolar skin grafts they used in my surgery began to fail two years afterward. I have to wear bandages on my chest every day. The doctors who helped me to transition have not given me the appropriate care for any of these complications, either.

14. You may be wondering what role my parents played in my transition and whether they forced me to endure the transition and the consequences, although unforeseen, were part of the transition process. In fact, they were quite shocked when I first told them about my feelings of discomfort around my birth sex and my desire to be seen as their son. They wanted me to be comfortable, but they were not okay with me going beyond cutting my hair shorter and dressing like a boy. They wanted me to explore without intervention and wait until I was legally an adult to let me decide whether I wanted to go the medical route. When my parents expressed this concern to my doctors, their concerns were dismissed and the doctors lied to my parents. They were told that all children are confident in their gender identity from a very young age, that the regret rate of transitioning is less than 1–2%, and that were I not affirmed in my identity and decision to transition, it was likely that I would commit suicide. They were not given any other option. My parents were forced to make this decision under duress.

15. But even if they were on board with me transitioning medically from the start, no parent, or any adult, really, has a right to determine whether a child gets to be chemically

sterilized or mutilated. Under most circumstances, this would be called abuse. But somehow, we have managed to market procedures that take away function from the body as “necessary, life-saving healthcare” for children and adults alike.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on May 31, 2023.

  
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Chloe Cole